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12 Attorneys for Plaintiffs/Counterdefendants

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA
15

16 ALLSTATE INSURANCE COMPANY,
ALLSTATE PROPERTY & CASUALTY
17 INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, and ALLSTATE
18 FIRE & CASUALTY INSURANCE
COMPANY,

19 Plaintiffs,

20 v.

21
22 RUSSELL J. SHAH, MD, DIPTI R. SHAH,
MD, RUSSELL J. SHAH, MD, LTD., DIPTI
23 R. SHAH, MD, LTD., and RADAR
MEDICAL GROUP, LLP dba UNIVERSITY
24 URGENT CARE, DOES 1-100, and ROES
101-200,

25 Defendants.

26
27 AND RELATED CLAIMS
28

CASE NO. 2:15-cv-01786-APG-CWH

STIPULATION TO INCLUDE THE LAW
OFFICE OF WILLIAM JACKSON INTO
THE STIPULATED CONFIDENTIALITY
AND PROTECTIVE ORDER (ECF NO.
39) FOR THE DISCLOSURE OF
DOCUMENTS PURSUANT TO F.R.C.P.
45 SUBPOENA

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and
4 the LAW OFFICE OF WILLIAM JACKSON (non-party herein after referred to as "JACKSON")
5 hereby stipulate and agree as follows:

6 1. Plaintiffs served JACKSON with a subpoena pursuant to F.R.C.P. 45 for the
7 production of documents regarding communications and payments made by and between Law Firm
8 and the Defendants during JACKSON's representation of certain clients in personal injury claims for
9 which Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

10 2. JACKSON is aware that Plaintiffs have subpoenaed several law firms seeking the same
11 type of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*
12 *Belsky, et. al. Case No. 2:15-cv-00065-MMD-CWH* ("*Belsky*").

13 3. JACKSON understands that this Court presides over both the instant matter as well as
14 the *Belsky* matter, and that this Court has ruled consistently in both these cases and ordered other law
15 firms to produce the same type of documents request of JACKSON.

16 4. A stipulated confidentiality and protective order in this case entered between Plaintiffs
17 and Defendants for the disclosure of confidential, sensitive or other protected information was
18 approved by this Court on May 20, 2016. (ECF No. 39).

19 5. JACKSON was not a party to the stipulated confidentiality and protective order. (ECF
20 No. 39).

21 6. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also
22 ordered that the confidentiality and protective order (ECF No. 39) be applied to those law firms.

23 7. In accordance with this Court's prior rulings both in this action and in the *Belsky*
24 matter, the parties hereby stipulate and agree that the protections and scope articulated in the
25 Stipulated Confidentiality and Protective Order approved by this Court on May 20, 2016. (ECF No.
26 39) be extended in their entirety to cover JACKSON in its compliance with Plaintiffs' subpoena.

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1 8. JACKSON will produce all documents responsive to the subpoena within ten (10) days
2 of approval and entry of this Order by the Court.

3 IT IS SO STIPULATED.

4 Dated: 1/30/19

Dated: 1/29/19

5 McCORMICK, BARSTOW, SHEPPARD,
6 WAYTE & CARRUTH LLP

LAW OFFICE OF WILLIAM JACKSON

7 By: /s/ Dylan P. Todd

By: 

8 DYLAN P. TODD, ESQ.

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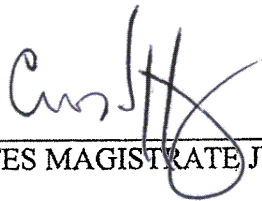
10 *Attorneys for Plaintiffs/Counterdefendants*

702-675-4914

11
12
13 ORDER

14 IT IS SO ORDERED.

15 DATED this 4 day of February 2019.

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18 UNITED STATES MAGISTRATE JUDGE
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